



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

of the American Reported Decisions. They are divided into four classes, A, B, C and D. **Standing of State Reports.** A stands for very high and D for very low. B and C and "middling." Under A are placed all the Federal Reports, both Supreme and Circuit, all the reports of Massachusetts and Pennsylvania, and all the reports of New York, except Anthon. Under "D" (a sort of index expurgatorius, for the English Bar, we suppose), no fewer than nineteen reporters have the misfortune (in several cases quite well deserved) to figure. Kentucky and Tennessee lead the procession, Bibb, Hardin, A. K. and J. J. Marshall, Monroe, Peck, Martin and Yerger, Humphrey, Cooke and Yerger all appearing. Ohio appears twice (Wright and Hammond), and Alabama (Porter), North Carolina (Martin), Connecticut (Kirby), Maryland (Harris & McHenry), Indiana (Blackford), Virginia (Va. Cas.), and New York (Anthon), each one. All the rest of the reports and reporters are rated "B" and "C,"—fair and middling.

NOTES OF CASES.

State—Suits against.—A suit against a state officer to cancel a tax title is held in *Sanders v. Saxton* (N. Y.) 1 L. R. A. (N. S.) 727, to be within the rule that a state cannot be sued.

Municipal Corporations—Water Companies—Consumer's Right.—A consumer's right to maintain a suit to compel a water company to furnish water at rates stipulated in a contract with municipality is upheld in *Pond v. New Rochelle Water Co.* (N. Y.) 1 L. R. A. (N. S.) 958.

Adverse Possession—What Constitutes.—Inclosure of a right of way is held in *Pritchard v. Lewis* (Wis.) 1 L. R. A. (N. S.) 565, not to be sufficient possession to ripen into an adverse title.

A grantee from a mortgagor, who takes possession of a strip beyond the true boundary line, is held in *Thornely v. Andrews* (Wash.) 1 L. R. A. (N. S.) 1036, not to be in adverse possession as against the mortgagee until the mortgage becomes due.

Criminal Law—Questions by Jurymen.—The failure of the court, in a criminal case, to interpose objections to improper questions made

by a juryman is held, in *State v. Crawford* (Minn.) 1 L. R. A. (N. S.) 839, not necessarily to be reversible error in the absence of objection or exception by counsel.

Arbitration and Award—The Umpire.—Fraud or mistake on the part of an umpire, so great and palpable as to imply bad faith, or his failure fairly and honestly to perform the function assigned to him, is held, in *Edwards v. Hartshorn* (Kan.) 1 L. R. A. (N. S.) 1050, to invalidate his decision.

Banks and Banking—Deposits.—The right of a bank to apply to the personal obligations of a commission merchant money received for produce sent him for sale and deposited by him in his general account in the bank is denied in *Boyle v. Northwestern Nat. Bank* (Wis.) 1 L. R. A. (N. S.) 1110.

Negotiable Instruments—Indorsement.—One whose indorsement was secured upon a note by the trick of inducing him to sign his name to a paper placed upon the note in such a way that the ink penetrated through to the note is held, in *Yakima Valley Bank v. McAllister* (Wash.) 1 L. R. A. (N. S.) 1075, not to be liable.

Negotiable Instruments—Certainty of Payment.—The rule making certainty as to payment a condition of negotiability was applied in *Joseph v. Catron* (N. M.) 1 L. R. A. (N. S.) 1120, by denying the negotiability of a note payable upon the confirmation by Congress of a certain land grant.

Newly Discovered Evidence—Practice.—A supplemental bill in the nature of a bill of review is held, in *Hardwick v. American Can Co.* (Tenn.) 1 L. R. A. (N. S.) 1029, to be a proper proceeding to bring before the court new matter discovered by defendant while the decree is in process of execution.

Negligence—Release of Damages.—Injuries caused by gross negligence are held, in *Chicago, R. I. & P. R. Co. v. Hamler* (Ill.) 1 L. R. A. (N. S.) 674, to be included in a release, by a sleeping car porter, of the railroad company from liability for negligent injury.

Railroad Stations—Lighting.—What is a reasonable time to keep a station platform lighted prior to the arrival of a train is held, in *Abbot v. Oregon R. & N. Co.* (Or.) 1 L. R. A. (N. S.) 851, to present a question for the jury.

State Corporation Commission—Freight Rates.—The approval by the state commission of a freight rate based upon limited valuation of